

The Honorable Magistrate Judge Steven I. Locke  
United States District Court, EDNY  
100 Federal Plaza, Courtroom 820  
Central Islip, NY 11722-9014

October 6, 2015

**Re: Barbato et al v. Knightsbridge Properties, No. 14-CV-7043  
Response to Plaintiff's letter of September 28, 2015 re: Third Request  
for Production and Second Set of Interrogatories**

Dear Judge Locke:

Plaintiffs, by way of the above referenced letter, seek a date certain for disclosure of last known addresses and emails.

With Court permission, Defendant will provide responses to the Second Set of Interrogatories by the end of business Thursday, October 8, 2015.

Also with the permission of the Court, Defendant will provide responses to the production request by October 27, 2015. Defendant began the process of responding to the requests, contacting the IT provider. However, some of the regular progress on this case, as well as others, was hampered when the undersigned served as Juror #6 on a petit jury in Nassau County, from September 20, 2015 to October 5, 2015. We are in this case, however, back on track, having conducted a deposition this morning. Therefore, the defense requests three weeks, up to and including October 27, 2015, to respond to the production request.

Respectfully Submitted,

/s/ John F. Geida /s/  
John F. Geida, Esq.  
General Counsel  
Knightsbridge Properties Corp.  
1155 Northern Boulevard, Suite 210  
Manhasset, NY 11030  
jfg@knightsbridgeproperties.net  
(917) 848-2769

### **CERTIFICATION**

The above has been filed electronically on the date herein, and such shall be sent to all counsel of record pursuant to the Court's CM/ECF electronic filing system.

Dated: October 6, 2015

/s/ John F. Geida /s/  
John F. Geida, Esq.  
General Counsel  
Knightsbridge Properties Corp.  
1155 Northern Boulevard, Suite 210  
Manhasset, NY 11030  
jfg@knightsbridgeproperties.net  
(917) 848-2769